

August 9, 2016

Mr. Ron Curry
Regional Administrator
United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

RE: San Jacinto River Waste Pits

Dear Mr. Curry:

The Harris County Flood Control District is a special purpose district created by the Texas Legislature in 1937 to devise and implement flood damage reduction plans. The District's jurisdictional boundaries coincide with Harris County, a community of more than 4.5 million people that includes the City of Houston. The County contains 22 primary watersheds within 1,756 square miles. The San Jacinto River is one of these watersheds and the remediation of San Jacinto River Waste Pits Superfund Site (the site) situated on the River near its mouth and the potential impact from the waste contained in this highly vulnerable location is a great concern to the District.

As the Executive Director of the Harris County Flood Control District, I am very familiar with the natural forces at work at the site. I am deeply concerned that the Environmental Protection Agency would consider any proposal for cleaning up the site short of removal. The highly toxic waste at the site in this major river's floodway and subject to extreme forces of flood flow, tides and storm surge should not be allowed to remain there.

I am a licensed professional engineer and during my 35 years at the District I have been responsible for the implementation of many flood control projects. I am confident that if best construction and engineering practices are followed, the waste in question can be removed safely.

It is my opinion that leaving the waste in place is not safe and removal is the only reasonable remediation option.

Sincerely.

Michael D. Talbott, P.E., D.WRE

Executive Director

MDT:to

cc: Rock Owens, HCAO